

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

MOREHOUSE ENTERPRISES, LLC)
d/b/a BRIDGE CITY ORDNANCE, ELIEZER)
JIMENEZ, GUN OWNERS OF AMERICA, INC.,)
and GUN OWNERS FOUNDATION,)

Plaintiffs,

V.

BUREAU OF ALCOHOL, TOBACCO,
FIREARMS AND EXPLOSIVES; UNITED
STATES DEPARTMENT OF JUSTICE; and
STEVE DETTELBAUGH, DIRECTOR OF ATF¹,

Defendants.

Case No. 3:22-cv-00116-PDW-ARS

PLAINTIFFS' MOTION TO EXCEED PAGE LIMITATIONS

Come now, Plaintiffs, by and through counsel, pursuant to Civil Rule 7.1(C), and for good cause, file this Motion to Exceed Page Limitations, and in support state as follows:

1. Plaintiffs filed their Complaint for Declaratory and Injunctive Relief on July 5, 2022. Due to the Final Rule’s voluminous length (98 pages of Federal Register text) and sweeping changes to the law (dozens of new regulations), Plaintiffs’ Complaint was 154 pages and included 61 exhibits.

2. Due to the significant size and complexity of the Final Rule, the allegations contained in Plaintiffs' Complaint, the complex issues of federal law involved, and the necessity to provide the

¹ Steve Dettelbach was sworn in as Director of ATF on July 19, 2022, and is automatically substituted pursuant to Fed. R. Civ. Pro. 25(d).

Court with the briefing required to address Plaintiffs' Motion, it is necessary to exceed the page limitations set by Civil Rule 7.1(B).

3. Plaintiffs' Memorandum in Support for Preliminary and/or Permanent Injunction is 27 pages in length, 7 pages over the limit established by Civil Rule 7.1(B).

4. As such, Plaintiffs respectfully submit they have established good cause, and request the Court allow the Memorandum in Support of their Motion to exceed the page limitations set by Local Rule by 7 pages.

5. Plaintiffs' counsel conferred with counsel for Defendants who stated that they would not oppose this request if Plaintiffs would not oppose a similar request by Defendants. Plaintiffs will not oppose such a request for the same number of pages.

Respectfully submitted, this the 25th of July, 2022.

/s/ Stephen D. Stamboulieh
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CERTIFICATE OF SERVICE

I Stephen D. Stamboulieh, hereby certify that I have on this day, caused the foregoing document or pleading to be mailed by United States Postal Service first-class mail, postage pre-paid, to the following non-ECF participants:

Director of ATF
Bureau of Alcohol, Tobacco, Firearms and Explosives
99 New York Ave, NE
Washington, DC 20226

United States Attorney General
Department of Justice
950 Pennsylvania Ave, NW
Washington, DC 20530

Civil Process Clerk
U.S. Attorney's Office
655 First Avenue North, Suite 250
Fargo, ND 58102-4932

And by electronic mail to:

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Dated: July 25, 2022.

/s/ Stephen D. Stamboulieh
Stephen D. Stamboulieh